

67120

USCG-99-6224-20

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JUL 29 1996

Capt. Samuel P. Scragg
5399 E. Esche Dr.
Newburgh Ind. 47630
812-853-6235

July 29, 1996

Executive Secretary, Marine Safety Council (G-LRA/3406) (CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

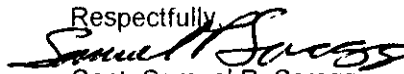
Subject: (CGD 94-055) Request to hold public meeting

Gentlemen,

After reading the Federal Register Part V Department of Transportation Coast Guard 46 CFR Parts 10 and 15 Licensing and Manning for Officers of Towing Vessels; Proposed Rule, I am requesting public meetings be held at some of the Coast Guard Marine Safety Offices through out the Western Rivers, Inland, and Coastal areas. The reason for this request is most active Mariners do not have access to the CFR nor do they know what the 46 CFR Parts 10 and 15 pertain to. Many Mariners may choose to voice comment about these proposed rules instead of written comments. I am asking that there be adequate notice given through the weekly Notice to Mariners reports prior to all meetings. Most mariners DO NOT READ THE FEDERAL REGISTER. Publishing the notice in the weekly Notice to Mariners report would be the most effective way of alerting mariners of these meetings; This would also serve as a cost effective means of notification.

Referring to my letter to LCDR Don Darcy dated 10/22/95, it is still my contention that the active or working mariner has had little influence in the drafting of these proposed rule changes. The advisory committees (TSAC & MERPAC) were made up of **Marine Industry Executives and Management** . This group does not represent the best interest of the working mariner. They represent the best interest of corporations and their stockholders.

Given the major changes proposed, without having public meetings you do not give the very people that these changes will have adverse effect on every opportunity to express their opposition and view points.

Respectfully,

Capt. Samuel P. Scragg
License # 727584 --
Issue # 6

JUL 29 1996

CGD 94-055
Discussion of Proposed rule

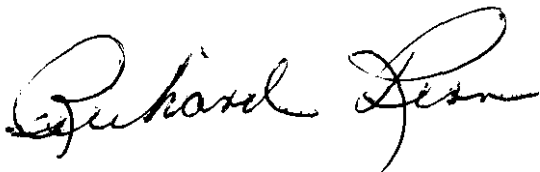
(1) I agree that some **changes** are needed to maintain, or increase the level of safety that our profession demands. The pilot processing plants (**schools**) do not do this. They do not instruct you on how to pass the USCG examination. They do not have any interest in whether you can or cannot operate a vessel on the waters of the United States. The elimination of the OUTV license will not **change** the system. There are many competent mariners who possess this license only because their company does not require any **thing** else. Many of these same mariners **probably** have safe **navigation** records. I would like to see a license difference between harbor pilots and the line haul pilots. This license could be an OPERATORS **LIMITED**. These should apply to shift **tugs** or dinner bucket style vessels. To take an individual who operates with one or two **barges** most of the time and turn him loose with 25,000 or more tons is an accident looking for a place to happen.

You had three mariners who **agreed** with the elimination of the OUTV but they themselves have not initiated any effort in **upgrading** their own license. The first class license is only good valid for the mileage listed. You either need a MASTERS or the OUTV to pick up the rest

I also **disagree** with the 3000 hp clause. On **locking** rivers a vessel that is less than 3000hp can handle the same size tows as a vessel of greater horsepower under normal conditions. **THE REVIEW OF MARINE SAFETY ISSUES REGARDING UNINSPECTED TOWING VESSELS**. Dated **12/1/93** states that there were 12,971 marine casualties during (**1980-90**). Of these accidents 7,664 were attributed to personal error. On the inland waters involving towing vessels. 61% were caused **by** vessels over **1200hp**. This statement has no merit. The vessels under **1200hp** usually handles only one or two barges. These vessels are usually found tending a harbor and not found **transiting** in a **commercial** trade. If you were **setting** a scale of **1000hp** per **barge** then a vessels which tows 15 barges on a **locking** would require **15,000hp**. If **anything**, the smaller shift vessel usually has his tow over powered.

Sincerely yours,
Richard Kern
P.O. Box 26
Triadelphia WV. 26059

Licensed: RASTER WESTERN RIVERS STEAM OR MOTOR VESSEL
701029 FIRST CLASS PILOT OF STEAM OR MOTOR VESSEL
OPERATOR OF UNINSPECTED TOWING VESSELS



CGD 94-055
Discussion of Proposed Rule
Horsepower as Basis of Authority

- (3) I do feel that a simulator will have a positive effect. I personally would like to use one to practice in some different locations. A simulator would be instrumental in the teaching and the licensing of a person wanting to get his or her OUTV for the first **time**. The simulator could be set up for 25 miles of waterway of the pilots choice. On this stretch of waterway the mariner should have no problems. They should also have to test out on 25 miles of waterway of the instructor choice. This would enable the instructor to evaluate the pilots navigational skills, how to assess areas never before **seen**. and what he does when problems arise. The instructor would then have a better over all view of the pilots ability. The simulator should be set up for both harbor (shift) boats and line haul vessel alike. Depending on the type of license the pilot is attempting to achieve is what they would test **on**.

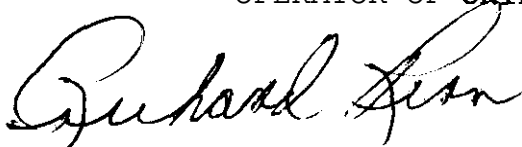
According to your own findings there has only been a 1.6% bridge **allision** rate from 1980 to 1991. The bridge being the most involved is the Crescent Rock Bridge. The usage of a simulator could study this and hopefully find a solution.

There is no need for check rider as termed in your report. There are suppose to already be this type of system in affect. Most Masters are checked out by the Port Captain or Marine Manager,. The pilots is either checked out by the **same** or even evaluated by the **Master** of the vessel in which he is working on.....

NOTE: information supplied: NATIONAL TRANSPORTATION SAFETY BOARD
Public Hearing, DCA-93-MR-007
Mobile, Alabama 12/14/93

Sincerely yours,
Richard D. Kern
P.O. BOX 26
Triadelphia, WV. 26059

Licensed: MASTER WESTERN RIVERS STEAM OR MOTOR VESSEL
701029 FIRST CLASS PILOT OF STEAM OR MOTOR VESSEL
OPERATOR OF **UNINSPECTED** TOWING VESSELS



JUL 29 1996

(Name) JAMES L. JONES
(Mailing Address) RT 1 Box 96
(City/State) NEW HEBRON, MS. 39146
(Date) 7-26-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

WE WORKED ON THE RIVER FOR 30 YRS.
I HAVE BEEN A PILOT FOR 25 YRS. I HAVE
HAD ACCIDENTS BUT HAVE NEVER KILLED ANYONE.
I RESENT BEING CALLED A MATE (PILOT).
I GOT MY OPERATOR LICENSING UNDER THE
GRAND FATHER CLAUSES. I AGREE TO TAKE A
REFRESHER COURSE TO RENEW MY LICENSE
I DO NOT NEED ANYONE TO SHOW ME HOW
TO STEER A BOAT. EVERYONE HAS ACCIDENTS
BUT I'M SURE IT IS NOTHING COMPARED
TO TRUCK OR RAIL ACCIDENTS. I KNOW
SOME MATES THAT HAVE OUTV LICENSE
THAT DO NOT KNOW HOW TO GET UP & DOWN
THE RIVER. HOW DID THESE PEOPLE GET
THESE LICENSES?

Signature: James L. Jones (Attach additional pages)

3



JUL 30 1996

Malneport Towboats, Inc.

Marshall Wharf, P.O.Box 126

Belfast, Maine 04915

207-338-3000

July 30, 1996

Executive Secretary
Marine Safety Council
U.S. Coast Guard Headquarters
2100 Second Street SW
Washington, DC 20593-0001

In response to the notice of proposed rulemaking (CGD 94-055) Licensing and Manning for Officers of Towing Vessels. I have some observations and comments I would like to share.

First, are my qualifications and background. I have been employed in the towing industry for the past 24 years. I have been a deckhand, ~~AB/tankerman~~, barge captain, mate and captain of vessels ranging in size from 900 HP harbor tugs to 4300 HP ocean tugs pushing 200,000 bbl oil barges. For the last 7 1/2 years my partner and I have owned and directly operated 3 1800 HP ship assist/harbor tugs in mid coast Maine. My current License is Master 1600 CT. near coastal, 3rd. Mate any gross tons, oceans, radar observer.

My comments are as follows:

--No other license requires a practical demonstration of skills for either original application or renewal. I feel this would be excessively burdensome to the mariner and the employer, difficult to accurately and adequately judge all relevant skills and much more expensive than indicated. The breakdown of expenses does **not** take into account designated examiner fees and travel expenses or boat hire for mariner's not affiliated with an "in-house" program.

A better solution might be refresher training in the form of completion of a 2-4 hour seminar which would include discussions among the attendees regarding specific problem areas.

If this is to be required for towing licenses it should be required for all licenses for the same reasons.

---While rules of the road refresher training would be beneficial to all it covers only a small portion of the knowledge and skills required to perform the duties of master/mate. Judgement, or the lack of it, seems to be the underlying reasons for the fact that 60% of the casualties were caused by

human error. Inclusion in mariner's training of resource management, adverse situational planning and psychological factors influencing decision making would be beneficial. If a rules of the road refresher training were instituted it should be a choice of:

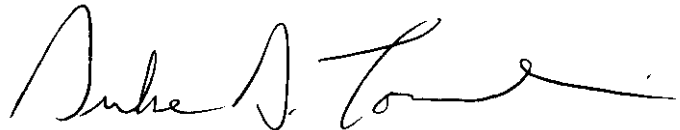
- 1) open book exam of 50+/- questions
- 2) completion of an approved seminar of 2-4 hrs.
- 3) completion of a 2 hr. video course with questions throughout to ensure the mariner was watching and paying attention

---I support a special harbor endorsement, free of horsepower limitations for masters/mates of towing vessels. The flexibility necessary in harbor work/shipdocking assignment of tugs requires this and as pointed out the skill level in this type of work doesn't change with horsepower.

---Approved training courses which combine formalized classroom instruction, simulator experience and hands on practical learning provide the broadest and deepest range of education and establish a solid foundation for future learning. They should be mandatory for all entry level (i.e. mates, assistant engineers) applicants but should only be required that one time.

Thank you for your time and the opportunity to respond.

Sincerely,

A handwritten signature in black ink, appearing to read "Duke D. Tomlin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Captain Duke D. Tomlin
Vice-President
Maineport Towboats, Inc.

(Name) John Morgan
(Mailing Address) 592 Roberts Road
(City/State) Duke of the Sea 3822
(Date) 7/30/98

JUL 30 1998

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

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I would also like to make the following personal comments to the public docket about this rulemaking:

I don't like the proposed Rule that says "Master's duties and overall responsibilities on overseeing the safety of the vessel are indivisible / there is no way one person can or should be held responsible for some one else accident / Master cannot drive / pilot a boat 24 hrs a day / these duties / being responsible for the safety of the vessel be assigned to 2 persons - each person to be responsible while he/she is actually awake and on duty and at the controls of the vessel;
I think the horse power break point is wrong - a 5600 H.P. and under / and a 5600 to unlimited will be better
Many Boats in the 5600 H.P. Range want.

Signature: John Morgan (Attach additional pages)

the area from St Louis to
St Paul and many of these
pilots can not or are not
posted well enough to
work from St Louis to New Orleans
maybe a 3000 H.P. to 5600 H.P.
Range should also be created.
those will cover the Range many
pilots work in / ~~Alciff~~ pilot
with 3000 H.P. cannot be the
Master of the Vessel who is going
to be held accountable for
the Safety of the Vessel. There
will not be enough people in
the unlimited H.P. Range to
also serve as Masters of these
vessels / Nor will they necessarily
be qualified to pilot these
boats in the Area they work
in / So a License for Master of
Vessel - 3000 H.P. and under is
needed. A master lic. for 3000 H.P.

John Morgan

John Morgan

to 5600 H.P. and ~~the~~ Master
Lic. for 5600 HP to unlimited

Also a way to prove that
a pilot is posted / knows
the area he is running his
boat in is needed / and drawing
the River is not enough any
one can study a map and do
these. Maybe this can be done By
check Aides and Company documents
of their employees;

The expense of this new license
should not be paid by us / the
pilots / the Government / e.g. DOT.

EPA / Pollution etc / are forcing
this on the pilots of Inland
waterways after years of ignoring
us and our needs. My tax
dollars can be spend to change

working on my license / for
the change in the license is
not needed nor will it
make be a better pilot.

nor make me a more Responsible
or a safer Pilot.

if we Really want a safer
inland water way we need
~~to~~ more and better work at
aid's to navigation / Also the
Buoys more often / better lighting
on Bridges / the old type
Channel Reports on a Regular
Basis - that give the depth date
and amount of Buoys / Red's / and
Black's in a Crossing / need
hazards to navigation removed
in a more timely manner
such as narrow Bridges old
docks that are out of use.

also if we are going to
look at manning of the vessels
and a more Responsible type
line for pilots / we also look
at the SIZE and level of
John Morgan

experience of the deck crew
and engine room. Most boats
now have 1 engineer who
cannot watch or be in the
engine room 24 hrs each day
that in itself creates and
unsafe condition on the boat.
Some boats only have 1 deck hand
on watch and no qualified engineer.

Thanks

Captain

John Morgan

Reflet Capt.

M/V Hartens B. Ingram

Ingram Barge Co

Cg Lic. # 727392

Issue # 5

P. 3.

Another area that needs to be addressed that is more important than licensing is the size of tows (amount of Barges Towed in a single group - many boats commonly tow Barges that heavily drafted and too many for the Horse power of the Boats. The pilots and master don't have much control over these for the companies we work for dictates the size of these tows if we want to work we have to tow the tows even though we may feel that the Boat is over loaded; a realistic H.P. tonnage ratio needs to be set and enforced and force the company to comply with these so that we cannot be forced to stop and unload tows

John Morgan

JUL 30 1996

(CAPT.)

(Name) HOWE JEFFERY LEACH

(Mailing Address) Rt #6 Box #15390

(City/State) Louisville, Kentucky - 40230-9409

(Date) 7/29/1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

With all due respect, To THE "MARINE SAFETY COUNCIL" AND THE "U.S. COAST GUARD" THAT I
PERSONALLY HAVE TRIED TO FOLLOW ALL RULES & REGULATIONS SET FORTH IN MY "29" YEARS OF WORKING IN
THE MARINE INDUSTRY. HOW EVER THESE NEW RULES I FEEL ARE TOTALLY UNCONSTITUTIONAL, TOO
DEMANDING, UNJUSTIFIED, & UNFAIR. I FEEL AS OPERATORS ETC. OF INLAND & WATERSIDE WATERWAYS
HAVE DONE A TERRIFIC JOB OF TRYING TO CLEAN OUR WATERWAYS UP AND COMPLYING WITH RULES
AND REGULATIONS. BUT YOU MUST TAKE IN CONSIDERATION WE CAN ONLY DO WITH WHAT WE HAVE
TO WORK WITH. SURE CORPORATIONS HAVE BIG TIME LAWYERS TO TALK AND MAKE PROMISES, BUT
VERY FEW PROMISES ARE EVER KEPT. AND YES THEY HAVE THE MONEY TO MAKE A DIFFERENCE
WE ARE JUST PEOPLE, WORKING PEOPLE, TAXPAYERS, WHO LIVE WITH THE AMERICAN
DREAM OF OWNING A HOME, RAISING A FAMILY, SEEKING THE HOPE OF OUR CHILDREN HAVING
THE OPPORTUNITY TO ATTEND COLLEGE AND HAVING A BETTER FUTURE THAN US. BY MAKING US
TO ACCEPT THE BURDEN AND TOTAL RESPONSIBILITY IS TOTALLY UNJUST & UNFAIR. I CAN ONLY
CONCLUDE THAT THESE ACTS WILL DEVASTATE THE MARINE INDUSTRY, ITS CO-WORKERS,
EMPLOYERS, THEIR FAMILIES FOR GENERATIONS TO COME. A SOLUTION SHOULD BE SOUGHT WHERE
WE ALL COULD WORK TOGETHER. AFTERALL THE UNITED STATES IS OUR COUNTRY - CAN'T WE ALL BE

Signature: Capt. Howe Jeffery Leach (Attach additional pages)

Prison Together?

6

J. E. Leach

(Name) WILLARD L WOLFE
(Mailing Address) 1105 E MAIN
(City/State) AUSTIN AR. 72007
(Date) 7-30-96

JUL 31 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94.055)
United States Coast Guard Headquarters
2100 Second street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

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I would also like to make the following personal comments to the public docket about this rulemaking:

I would think that raising the horsepower
limits to 3200 or 3400 this is in keeping with
a 15 or 16 Barge Tons as these horsepower ratings
are not much less in any other size tank
upper or lower River. 3200 HP would limit
HP person from working with companies with nearly
3200 on the upper Mississippi River. I don't believe
that 3200 HP any less than 3200 & 3200 is better
as there are needs of them both are 15 Barge
Barges at 700 HP per Barge in normal River
Stations & less on Water Rises.

Signature: Willard Wolfe (Attach additional pages)

Jewel C. Mason, Sr.
9295 Watson Drive
Denham Springs, LA 70726

AUG - 21999

July 29, 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
Unites States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemakina on Licensing and Manning for Office of Towina Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towina Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only **changes** to these regulations are cited in the **NPRM** on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to **fully explain** and discuss all aspects of this Rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this Rulemaking:

1. I will be grandfathered into the **new** licensing **rules**. I have been a towboat Captain (Master) for over thirty years. Yes, over my years of experience I have seen areas where more stringent rules should be applied.

2. It is my understanding that the accident near Mobile, Alabama, in September 1993, which caused 47 deaths, was caused by an ethic minority which had taken the test several times and could not pass the examination. Upon complaints to the NAACP and his politicians, a license was issued to this individual, although he was not qualified to steer a towboat.

3. As long as the Coast Guard and politicians will allow a **non-**qualified individual (regardless of ethic heritage) to receive a license, accidents such as the Mobile accident will continue to happen.

4. I do not have any specific problems with the **new** proposed rules as long as they are strictly adhered to by all individuals applying to the Coast Guard for any type of marine license.

Jewel C. Mason, Sr.

AUG - 5 1996

(Name) Rudy H Ward
(Mailing Address) Rt 2 Box 259 Gum Corner Rd
(City/State) Eudora, Ark 71640
(Date) 7/31/96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 1.5, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I hold a 1600 ton Master Inland Waters, license # 727429, with a 1st Class Pilot endorsement. I have been in the pilot house since 1975. Presently I am employed with ARTCO on the M/V American Pillar, #577910, a 10,500 Hp pushboat. My primary duty is the transportation of 35-40 barges southbound and 49-56 barges northbound between the ports of St Louis, Mo and New Orleans, La. My previous jobs found me on nearly every river on the Western River system and from Brownsville, Tx to Florida on all sizes of tows both dry and liquid. I would like to thank you for the opportunity to make a few comments on the proposed rule.

Signature: Rudy H Ward (Attach additional pages)

changes regarding an industry.

- ① I feel we need more employee input into the rules that are going to directly affect us. Your greatest source of information should come from those with the most knowledge. When it comes to what is and isn't safe no one has more knowledge than the experienced veteran doing the job.
- ② Attempts have been made to clarify the differences between blue and brown water operating practices. For the most part they cannot be blended and continued efforts to define them and separate them should be made. Everything is different from living conditions to vessel handling. There just simply must be separate and distinct operating procedures.
- ③ In paragraph 8 on page 31333, Federal Register, Vol 6, 10119 reference is made to one knowledge of the geographical area being achieved through a 1st Class Pilot license. This basically true but in the name of safety the present 1st Class license is entirely too detailed. I understand we have charts but have you tried reading a map going down hill on a winding road with a 48 wheeler. Dealing with this on what is or isn't safe it would not be an optimum burden for the men who run these boats to draw a simple sketch showing the basic contour of the

river. In addition he should know the general location of navigation lights, names of bends and positions of bridges and the channel spans on those bridges. This sounds very simple but you would be amazed at the men who do not have this elementary knowledge. All the other additions on the present 1st Class license have nothing to do with preventing collisions with other vessels or bridges. This basic information should be required on all original and up graded licenses. Why should a man not be required to know where he is. I'm not saying do away with the present 1st class license but to beef up requirements on other license that will really make a difference in safety.

④ River conditions, river stages, tow sizes and locking abilities should be considered on a original set of license or in the upgrading process. A man's abilities can not be displayed in one trip under 1 set of conditions.

③ 90 days is not near enough time to change from one body of water to another. A person in my opinion can not change from open water and towing astern to operating in swift narrow channels pushing ahead. Its just too different. 90 days is not enough time to get exposed and become reasonably proficient with new operating procedures.

⑥ There needs to be a three class system (small, medium, large, 0-3000hp, 3000hp-6000, 6000hp and up. Also consideration must be given to tow size not just horsepower. You can not safely take a man on a 6000Hp vessel running a double unit on 15 barges or the upper and safely put him on 30-40 barges on the lower just because he can handle the boat. A man may be able to handle a big truck but can he handle the trailer behind it. You don't take a man in a paper cub and turn him loose on a T+T. The timing and judgement becomes more and more critical as tow sizes increase and channels and bridge clearances decrease. If we are going to be safe this must be considered.

⑦ In response to paragraph 2 page 31334, Federal Register, Vol 61, No 119. You can not hold the master or captain responsible for accidents attributed to the pilot on watch. The primary reason for this view is the response time. Assuming the pilot gets in trouble, things happen so fast that by the time the captain gets out of bed and up to the pilot-house the situation is usually out of control to the point that no one could prevent the accident. Swift narrow channels make it most difficult to assess a situation fast enough to have someone else come up and

make adjustments quick enough to prevent a accident. The only way to apply the principle of making the master more responsible would be to go to 3 pilot house personnel. You would have 2 pilots running & he watches as we are now. You would have the master and he should hold a upgraded license, running a call watch. It would be up to him to make all bridges and places deemed trouble spots. The only fair way to make a man responsible is let him do it. Given the response time I see no other fair way to implement this principle.

- ⑧. I am against giving a proven pilot a actual rule of the road test with a pass or fail ultimatum. On the other hand I am very much for an approved rule of the road refresher course.

Once again thank you for letting me make these comments. I don't feel they are extreme or unreasonable. Applied these positions would make our industry a much safer organized place to work.

Capt. Larry Ward

AUG - 5 1996

(Name) JAMES W Ghrigsby
(Mailing Address) 6017 Castle Rd.
(City/State) Vicksburg, MS 39180
(Date) AUG 4 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 1.5, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I do not Agree or Dis Agree
with The Proposed Rulemaking. I would
Like more - - on over The Rules.

Thank you.

Signature:

Capt. James W. Ghrigsby

(Attach additional pages)

(Name) John Wayne Bowman
(Mailing Address) 503 North EVERETT
(City/State) Kennett MO 63857
(Date) 8-2-96

AUG - 6 '96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347. I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

1. AS A Pilot I work in i ai ber. The Cost of new
liceness would put me out of WORK.
we do not MAKE money needed for this.

2. I Have worked on 3000hr. power Tow Boats
pushing 15 Barges. Why IS There NO PROSED
Rule To Limit The Number of Barges For Horsepower.
Dispatcher In many cases, Tell you To pick up
more Barges Then River Conditions should allow.
The Dispatcher In most cases HAS NEVER Operator
A Boat. (you TAKE the Barges ARE lose your job.)!!

3. We have to carry RADAR Endorsement- NO Rule
Require RADAR on UNTESTED Tow Boats.

4 New Rule Are not needed. River Safety is Better-Then Rail Roads and
Trucking
Signature: John Wayne Bowman (Attach additional pages)

(Name) Dwight D. Ryan
(Mailing Address) P O Box 928
(City/State) Eddyville Ky 42038
(Date) 08-05-96

AUG - 8 --

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

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I would also like to make the following personal comments to the public docket about this rulemaking:

I think you should had come to us the working people
to find your answer's. We know what goes on out here on
the river most of your people can't run a towboat but you
want to regulat us. even if you talk with our company heads
they still don't understand what we go ~~thru~~ thru. And do 30 days
at a time 7 day a week 12 hrs a day.

You people went hog wild over one accident that should
had not happen it's sad yes now we must pay for your
mistakes that man should have not be lievece but AS everyone
knows pay 500.00 to the river school and you study your test till
you can pass. I belives I had a good future in towboating not
now I don't want to be captain & held responsible for the other guy
Did you talk with my father Almost 50 yrs. on the river
Almost 30 as capt. As the song goes he's forgot more than
you people will ever know. Come to us first ~~not~~ this time

Signature: Dwight D. Ryan (Attach additional pages)

P.S. I should write
A whole lot more about
this rule but you people
do what you
want no matter

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AUG - 8 1996

Aug. 4, 1996

Dear Executive Secretary,

As Vice President of American Inland Mariner, and an Operator of Uninspected Towing Vessels, USCG license # 49909; I would like to ask for an extension on the comment period for [CGD94-055]. We have run into a couple set backs trying to get the word out to the inland mariner. I would like to ask for an additional 60 days to the Oct. 17th deadline.

We have run into a delay with the Postal Service of getting the copies of the NARM mailed out. In some cases it is taking weeks to get this information to the inland mariner. Plus with our work schedules we are not always at home when this information does reach our mail boxes. It could be 30 to 60 days later before we get our mail. That doesn't leave much time to prepare a letter and get it mailed back to Washington. Also our industry hasn't been very cooperative to pass this information on to their employees. The burden of contacting all the inland mariners has solely been placed on AIM.

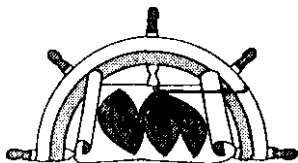
Due to the importance of [CGD94-055] and the effect it will have on the future of the inland mariner, I feel that every inland mariner should have the opportunity to respond. There are some very serious changes that could take place and some of these changes will be

very costly.

Also we could use this time to hold meetings and discuss this issue as a group. So any additional time that you could give us would be appreciated. Public meetings with the Coast Guard would be helpful too. There are some gray areas in this proposed rule that could use some defining. And being that the central and southern United States has the majority of the inland mariner, I'd suggest New Orleans as one place for a meeting such as this. I also feel that Memphis, TN, would be a handy place for another. Due to the travel expense it would be almost impossible for the inland mariner to travel to Washington DC for a meeting.

Thank you for your time and your consideration for my request is greatly appreciated. If you have any questions or would like any further discussion on this issue, I'd be glad to talk with you. I have enclosed my card with my address and phone number.

AMERICAN INLAND MARINER'S ASSOCIATION
John T. Cothran



1315 Ridgeway
Suite 104-186

Memphis, TN 38119-5318
(901) 382-3761

13

Thank you again,
John Cothran

V.P. of A.I.M.

USCG # 49909 OUTV

(Name) Leo LeJeune Jr.
(Mailing Address) 540 St. Landry St.
(City/State) Arnaudville, Louisiana 70512
(Date) August 2, 1996

AUG - 8 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I think that your Proposed Rulemaking Sucks.
Most of the licensed operators have been operating
vessels for years. Now you want to screw him out
of his license & his job. You want him to go
through a training that he has been doing
every day that he is operating that vessel. What
you are wanting to do, doesn't make much sense.
Stop & think of how many men you are going
to put out of a job. You shouldn't screw around
the number of people & companies that you are
going to screw because of the actions of
the pilot involved in the Amtrak accident.
Everyone shouldn't have to pay for his actions.

Signature: Leo LeJeune Jr. (Attach additional pages)

141

received AUG - 8 1996

(Name) CHRIS A. BURAS
(Mailing Address) 1005 HICKORY DR.
(City/State) LAKE CHARLES LA. 70601
(Date) _____

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

SEE ATTACHED PAGES

Signature: CCB (Attach additional pages)

Chris ~~Buras~~
1005 Hickory Dr.
Lake Charles, La 70611

Executive Secretary, ~~Marine~~ Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

Dear Sirs:

This letter is in response to the proposed ruling for licensing mariners on uninspected towing vessels. I have held an ~~OUTV~~ license for sixteen years and worked on towing vessels ranging from ~~800hp~~ to 4200 hp on Western Rivers and Inland Waterways and pushed as many as twenty loads at a time. I currently hold a Master Inland Any Gross Ton license for which I have worked very hard. For the past ~~two~~ and one half years now I have worked on Inland Passenger Vessels. At some ~~time~~ in the future I expect to be back in the towing Industry.

If I am reading this proposal correctly I would only receive a master 3000hp license Instead of an unlimited horsepower rating because the ~~companies~~ for which I have worked (on ~~OUTV's~~) running 3000hp vessels or larger are now out of business. other ~~companies~~ simply will not take the time to go back through their records as ~~it is~~ too time consuming and inconvenient.

I do not think ~~it is~~ just to keep being set back in this industry as we so frequently are. ~~Every~~ time we turn around there are new requirements and new fees for things that used to cost little or nothing to acquire, or new regulations levied against the wrong parties as the result of one or two casualties.

This ruling is aimed at the wrong party. It does not matter to a towing company ~~if~~ you have a 3000hp vessel or a ~~10000hp~~ vessel. They give you tows without taking into ~~consideration their~~ size then expect the Master to push them.

In order to make the waterways safer, size restrictions should be placed on the tows with a minimum required horsepower for a given size tow. With this in mind companies will next have to be monitored to ensure that they do not over-rate their vessel's horsepower.

~~As~~ it is now ~~with many companies~~ the office tries to tell the Captains what their vessels are capable of when in fact it should be the other way around. At present a Captain has no recourse. If you insist a tow is not safe to push, you risk losing your job. In many ~~casualties~~ I would feel safe in guessing that the vessels were underpowered for the tows they were pushing.

I have personally ~~experienced~~ cases where I have told my employer that the tows we were pushing and the area we were running required experienced ~~captains but inexperienced men were sent anyway~~. In other cases ~~companies~~ insist that the boat be run with only one engine or some other vital machinery in a state of ~~dlsrepa~~lr. The result of allowing the company to have the final say over the ~~captain~~ in these instances was that the vessel was involved in an accident.

I would like to point out that more casualties may result if these policies are implemented. By ~~making~~ the master responsible for watches ~~which~~ he is not standing fatigue ~~becomes~~ a major risk factor. In ~~addition~~ to his standard 12 hour watch he will have to be present on the bridge for ~~locks~~, draw bridges and traffic situations when prudent. This will allow for little or no rest in many situations. The only way to ease this added burden on the master, provided these regulations are implemented, would be to ~~require~~ two ~~mates~~ to operate the vessel thus enabling the master to be well rested for those times his presence ~~is~~ required in the pilothouse. The down side of this solution is that ~~companies will~~ not be able to pay for these extra mates without raising rates.

It seems that the only voice that is heard in all of this is that of the companies. No one is asking the captains and pilots, who have the most experience running these operations, what they think could be done to prevent future disasters. These are the people that will feel the greatest impact. These are the people who have the most insight into what is actually going on out there on the water. Much more consideration and ~~investigation~~ is needed before a decision is made regarding these proposals.

I would appreciate a response to this letter as I have a vested interest in the ~~outcome~~ of these proposals and I will continue to follow ~~developments~~ as they occur.

Sincerely yours,

Capt. Chris ~~Buras~~

AUG - 9 1986

(Name) Jesse Howell
(Mailing Address) 29699 Fletcher Lane
(City/State) Walker La. 70785
(Date) 8-8-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

8/8/86

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

Dear Sirs - From my knowledge of the industry in working on the River, I am saddened that these rules about lowering my license because some yo/yo didn't do his job properly is totally wrong - Sure I agree that new rules need to be placed and that stricter measures need to be placed on incoming wheelhouse people. But not at our/my level - I have been in a lot different areas and in different problems - but none that I could not handle, and for somebody to try and change my license because they feel like it will make it safer is wrong - If some thing is going to happen, the best way to avoid hurt or damage is to try and do as little damage as possible.

Signature: Jesse Howell

L.C.# 87088-OUTV

(Attach additional pages)

16

JO: Executive Secretary, Marine Safety Council
(G-LRA/3406) (CGP 44-0854)

P.2

USCG HQd.

2100 Second St. SW

Washington, DC 20573-0001

Possible, and even at that point you don't want things to happen, but they do.

How ever, for someone to come along after 20 years and slap you with unnecessary expense is not right and I totally dis-agree with it.

So Please try and consider at all points a ruling which would protect all parties involved and not put such unnecessary B.S on those of us who are trying to provide for our families.

I look forward to seeing what you guys can come up with that will help all of us to do our work safely and productively overall for our future's.

Also I dis-agree that the Master shall be held accountable for any other watch than his own - if a ruling must be put into effect on these grounds then each man or woman shall carry the burden of their own watch. Period.

Thanks Always

Jesse Howell

#3 - OUTY (#87088-

(Name) William L.S. Jackson
(Mailing Address) P.O. Box 220
(City/State) Lacombe, LA. 70445
(Date) 8-3-96

Aut
JUL - 9 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen.

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

THE RADAR SCHOOL THAT OPERATORS OF
OUTU HAS TO GO THROUGH IS USELESS! THE
AMTRACER ACCIDENT DIDN'T HAPPEN BECAUSE
OF RADAR IT WAS THE LACK OF KNOWLEDGE.
IF YOU WANT TO MAKE A RULE THAT
WILL ELIMINATE ACCIDENTS, THINK OF THIS
INLAND WATERS, RADAR IS AN AID TO
NAVIGATION, IF IT BECOMES FOGGY ON
THE WATERWAYS USE IT TO GET TO THE
BANK AND STOP YOUR VESSEL. OPERATING A
VESSEL IN SHUT OUT FOG SHOULD BE AGAINST
THE LAW. RADAR RANGES, RUNNING FIXES,
TRACKING OTHER VESSELS, SHOOTING TANGENTS WON'T
WORK ON THE INLAND RIVER SYSTEM. IT'S
USELESS!

Signature: William L.S. Jackson (Attach additional pages)

②

LICENSE FOR MASTER, MATE (PILOT)
OR APPRENTICE MATE, (STEERSMAN) OF TOWING
VESSELS. TO USE THIS FORMAT
WOULD CAUSE SERIOUS PROBLEMS ON
THE INLAND RIVER SYSTEM.

1. NO MAN IS GOING TO BE RESPONSIBLE FOR ANOTHER MAN'S ACTIONS.
2. THIS IS NOT THE MERCHANT MARINE THEY DO NOT RECOGNIZE THIS PART OF THE INDUSTRY.
3. TO USE THIS SYSTEM YOU WILL HAVE TO INCREASE THE WHEELHOUSE PERSONNEL TO 3 INSTEAD OF 2.
4. NO ONE WANTS THE CAPTAINS JOB. NOW, WHAT MAKES YOU THINK THAT ANYONE WOULD WANT TO BE THE MASTER.
5. HOW LONG WILL THESE NEW RULES BE IN EFFECT UNTIL YOU DECIDE TO ADOPT SOME NEW ONES, RIGHT NOW NO ONE KNOWS WHAT RULES APPLY TO WHAT THERE HAVE BEEN TOO MANY CHANGES.
6. OF THE 12,971 MARINE ACCIDENTS HOW MANY WERE WITH VESSELS OF 3000 HORSE POWER OR LESS?

③

YOUR LARGE TOWING VESSELS HAVE QUALIFIED OPERATORS, IT'S YOUR SMALLER VESSELS THAT TRY TO OPERATE WITH LITTLE OR NO EXPERIENCE. IT'S THE COMPANY THAT DECIDES WHO RUNS THE VESSEL.

2. ROUTES:

I RUN ANYWHERE AND EVERYWHERE TO RESTRICT MY AREA OF WORKING WOULD BE AN INJUSTICE.

3. DESIGNATED EXAMINERS,

SHOULD HAVE EXPERIENCE ON INLAND TOWBOATS FOR WHATEVER HORSEPOWER THE APPLICANT IS APPLYING FOR. MERPAR DOES NOT OPERATE ANY TOWBOATS, THE COAST GUARD SHOULD OVERSEE RENEWAL OR DESIGNATE SCHOOLS, CORP, ETC: TO TRAIN AND TEST APPLICANTS.

THE COST FOR RENEWAL OR NEW LICENSE KEEPS RISING, NEW SCHOOLS ADDED, NEW ENDORSEMENTS ETC. YET THE RATE OF PAY ON THE RIVER IS NOT RISING WE CANNOT AFFORD THE HIGHER RATES AND LESS PAY. OUR TIME AWAY FROM HOME IS COSTLY ENOUGH.

Ken Fisher

AUG 10 1996

(Name) WAYNE A. PAPE

(Mailing Address) 12233 Colonial Oaks

(City/State) Bonzales, LA. 70737

(Date) 8-9-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

- ① I don't see how that you can see that it is right to hold the master responsible 24 hours a day. Because the back watch man has been tested by the Coast Guard and issued a license showing that he is capable of operating a vessel. I just don't think that it's right to hold the master responsible for some one else's screw up.
- ② IT looks like with all the added cost for check rides and EVERY thing that you are trying to shut the little man out. This will hurt the Towing Industry because there's going to be a lot of masters, and pilots give up their license upon renewal and I for one will be one of them.
- ③ FIRST The ~~Master~~ Radar Endorsement and now this. You are making us all suffer because one man screwed up and hit an Antrock Bridge. I can

Signature: Wayne A. Pape (Attach additional pages)

UNDERSTAND THE RADAR ENFORCEMENT BECAUSE EVERYONE
NEEDS TO KNOW HOW TO NAVIGATE BY RADAR BUT THIS
LICENSE CHANGE IS NOT FAIR TO THE REST OF US.

YOU MAKE YOUR LIVING SITTING BEHIND YOUR
DESK, WELL WE MAKE OURS SITTING BEHIND THE
CONTROLS OF OUR VESSELS. THIS CHANGE IS GOING
TO MESS WITH OUR PERSONAL LIVES AND OUR
FAMILY LIVING. THE COMPANY THAT I WORK FOR
LIKE MANY OTHER COMPANIES PUTS THEIR MASTERS,
AND PILOTS TO A TEST. IF THEY FEEL THAT A
MAN IS NOT CAPABLE OF HANDLING A VESSEL, THEY
SEND HIM ON DOWN THE ROAD. I JUST DON'T FEEL
THAT WE SHOULD HAVE TO SUFFER BECAUSE OF
SOMEONE ELSE. IF ALL THESE CHANGES GO INTO
EFFECT I'M GOING TO STAY ON UNTIL RENEWAL AND
THEN I'M GOING TO GIVE MY LICENSE UP. THANKS
AND I HOPE THAT YOU WILL TAKE INTO CONSIDERATION
THAT MANY OF THE PILOTS THAT I HAVE TALKED
TO FEEL THE SAME WAY.

YOURS TRULY,
WAYNE A. PAPE

AUG 12 1996



LeBeouf Bros. Towing Co., Inc.

P.O. Box 9036
Houma, Louisiana 70361
(504) 594-6691
FAX: (504) 594-5253

August 12, 1996

Executive Secretary
Marine Safety Council (G-LRA/3406) [CGD 94-055]
U.S. Coast Guard Headquarters
2100 Second Street SW
Washington, DC 20593-0001

RE: **Notice of Proposed Rule Making**
46 CFR Parts 10 & 15
Licensing and Manning for Officers of Towing Vessels; Proposed Rule

Dear Executive Secretary,

The proposed rule changing the structure of OUTV licenses has presented me with several questions concerning operators holding Master's (tonnage) licenses and the addition of "towing endorsements" upon renewal.

For the questions below, assume the following:

- the operator holds a Master, Great Lakes and Inland, not more than 100 Gross Tons
 - the operator has operated a 98 ton, 1000 horsepower tug on the Intracoastal Waterway for a minimum of four (4) years
1. Will the operator, upon his next renewal, have a "towing endorsement" (i.e. Master of Towing Vessels, 3000 horsepower or less) added to his license?
 2. Will his license read similar to: "Master, Great Lakes and Inland, not more than 100 Gross Tons & Master of Towing Vessels, 3000 Horsepower or less?"
 3. When operating towing vessels, will he still be limited by his tonnage license?

For the questions below, assume the following:

- the operator holds a Master, Near Coastal, not more than 500 Gross Tons
 - the operator has operated a 240 ton, 1800 horsepower tug on the Intracoastal Waterway for a minimum of four (4) years
 - the answers given to the questions above were all "YES"
 - after a renewal adding the towing endorsement to his license, the operator quits his present company and goes to work for a company that operates towing vessels offshore
1. Which license is the individual working under?
 2. Can the individual work on a 350 gross ton, 3200 horsepower towing vessel offshore without obtaining a Master of Towing Vessels Unlimited?

I would appreciate any comments concerning these questions. Some of the possible implications will have a significant impact on our company. Thank you for your time and efforts!

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Naquin', with a stylized flourish at the end.

Rob Naquin
Safety / Personnel

(Name) HENRY R. MCCOY
(Mailing Address) 2419 LINCOLN AVE
(City/State) POINT PLEASANT, W.VA. 25550
(Date) 8-8-96

AUG 13 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

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I would also like to make the following personal comments to the public docket about this rulemaking:

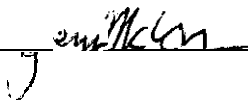
TO MAKE A MASTER RESPONSIBLE FOR THE ACTIONS
OF HIS PILOT IS TOTALLY ABSURD. THE PILOT HAS
BEEN ISSUED LICENSE THE SAME AS THE MASTER. THE
PILOT IS ACCOUNTABLE FOR HIS WATCH AND ACTIONS.
TO PLACE THIS BURDEN ON THE MASTERS WOULD HAVE
GRAVE REPROCCSSIONS TO THE TITLE OF MASTER. THE 3,000
HORSEPOWER LIMIT IS ALSO OUT OF CONTEXT. TO LIMIT
A PILOT TO THE VESSEL HE OPERATES WILL GREATLY EFFECT
THE LIVELIHOOD OF MANY OPERATORS. IT WOULD CREATE FINANCIAL
HARDSHIPS AS WELL AS LOSS OF EMPLOYMENT. I ASK THAT YOU
CAREFULLY REVIEW THIS PROPOSAL AND THE LONG TERM EFFECTS
ON THE 15,000 PILOTS AND THEIR FAMILIES. TO OPERATE A
TOWBOAT WARRANTS SKILL AND PROFESSIONALISM, WHICH IS
SHOWN THRU OUT THE WATERWAYS. THESE PILOTS ARE PRODUCTS
OF A RICH RIVER TRADITION. TO PUT ANYMORE BURDEN
ONT.

Signature: _____ (Attach additional pages)

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ON US; DISSEMINATING AS WE KNOW IT WILL BE LOST
IN THE COMING CENTURY, AS WELL AS THE SUPPORT
JOBS ASSOCIATED WITH THE RIVER INDUSTRY. WHY
CUT OFF OUR NOSE TO SPITE OUR FACE. CAREFUL
EVALUATION BETWEEN ALL PARTIES INVOLVED SHOULD
BE STUDIED BEFORE FINAL ACTIONS ARE TAKEN.

Signature: _____



(Attach additional pages)

AUG 15 1996

(Name) William T. Ashue
(Mailing Address) Box 25 North Wood Lane
(City/State) Chico City Arkansas 72521
(Date) 8-15-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I do not think it right to change all
rules because of a person's action. my self started
operating back in 60's when I had to have
to have license now I have my 5 star
I am going on 30 years of Boat operation
one with out any towing. Maybe I have
also worked on Camp 3000 been just about
every where on Rivers now all at once
Some one in Coast Guard want to change
causing people try to make a living phasing
if this law passes it will hurt lots
of Company and working people. It Not
Right for this law to pass.

Signature: William T. Ashue (Attach additional pages)

21

(Name) DAVE ANTHONY DISTRICH
(Mailing Address) 200 ROOKS DR
(City/State) SLIDELL, LA 70459
(Date) AUG 22, 1996

AUG 16 1996

USCG LICENSE 86676 ISSUE 0-4

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only chances to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I TRULY BELIEVE THIS IS A WASTE OF TIME AND MONEY BY THE GOVERNMENT. IT WILL HURT SO MANY OPERATORS WHO HAVE AN EXPERIENCE OF RIVERS OR TOWNS OTHER THAN THOSE THEY WORK NOW. THIS WILL MAKE IT HARD FOR THEM TO RETURN TO LAKE BOATS AND OTHER WATERWAYS. AS THINGS ARE, COMPANIES WILL NOT PUT OPERATORS ON BOATS WITHOUT THE EXPERIENCE REQUIRED. SO WHY DO WE NEED THIS CHANGE. I FEEL IT WILL ONLY BENEFIT THE COMPANIES. PAY RATES WILL GO DOWN FOR THOSE WHO WILL BE STUCK ON SMALL BOATS AND RESTRICTED TO CERTAIN WATERS. SO MANY OPERATORS DON'T EVEN KNOW ABOUT THESE NEW CHANGES, AND IT IS THESE PERSONS THAT WILL BE MOST AFFECTED.

SO LET THINGS STAY AS THEY ARE. PUT REGULATIONS ON GROSS TO HORSEPOWER RATIO. NOT ON OUR LICENSE.
Signature: Dave Districh (Attach additional pages)

P.S. THIS IS WHY SO MANY OF US ARE THINKING OF CAREER CHANGES.

22

(Name) Marvin L. Wooten
(Mailing Address) P.O. Box 180
(City/State) Pt. Pleasant W. VA
(Date) 8-14-96

AUG 17 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

ON Page 31334 Column 3. I think The Break Point
ON Horsepower Should Be Raised From 3,000 to 5,600.

ON Page 31334 Column I. I don't see how you can make
a Rule saying The master of the vessel would be Responsible
24 HRS a day. When Under 46 U.S.C 8904 A Person
May Not Work Over 12 HRS Except in Emergency.

ON Page 31336. Column III. I think we should take Refreshed
Course on Rules of Road. But you should have that in with
The 3 day Radar Course. So maybe It would keep the
Cost of a Renewal down.

I also would like the U.S.C.G. to Have a meeting My Area
Because on the upper Ohio River. There is a lot of Pilot's IN
My Area.

Signature: Marvin L. Wooten

(Attach additional pages)

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Page II

Also maybe it could be better
Explained to my fellow Pilots.
In language we could understand.
And we need to have some
in put In this Rule making

David. W. ~~Watts~~

AUG 15 1996

(Name) Capt. JAMES P. JARRELL
(Mailing Address) P.O. Box 548
(City/State) MASON WV 25260
(Date) 8/14/96.

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94.055)
United States Coast Guard Headquarters
2100 Second street, SW
Washington. DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347. I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all rowing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

I feel the 3000 Horsepower limit needs to be address and changed. I also think the level of proficiency needs to be addressed.

The responsibility of vessels to be strictly in charge of 1 Man. Well how is a man asleep restricted to 12 hours duty going to be responsible for a vessel running 24 hrs. a day. You going to pay him for all 24 hrs then scratch a Bridge Fee and send him to jail! This Stinks to High ~~Heaven~~ Heaven.

I would like you be advised of any legislative schedull that deals with 46 CFR.

Signature: Capt. Jim Jarrell (Attach additional pages)

Steve Cumm Jr.

RT# 3 Box 98

Golconda IL 62938-9410

AUG 15 1996

to Executive Secretary marine Safety Council
(G-LRA/3406) (CGD-94-055)
United States Coast Guard Headquarter
2100 Second Street, SW
Washington D.C. 20593-0001

Gentlemen

I have read the notice of proposed Rulemaking concerning Licensing and manning of towing vessels. I request that a public meeting be held at the nearest Coast Guard marine Safety office to explain and discuss the aspects of this rulemaking. I also request that you mail me a copy of the final rule making at this address, when published.

I would like to make these personal comments to the public docket about this rulemaking

I do not agree with the proposed 3000 hp cut off point. A great many boats on locking rivers push 15 barges with 1800 hp to 2800 hp. this proposal would have a great number of pilots and masters pushing the same size tows as the higher horsepower boats with a restricted license.

over

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I feel that 1800 hp would be more realistic since this is about the normal cut off point between Tugs and Tins haul boats.

I would also like to comment on the proposal that the master carry the burden of responsibility 24 hours a day.. at this point we are required not to work over 12 hr a day. which is more than enough. The majority of working people work only 8 hrs per day.

This rule would make the master responsible even when asleep. This would greatly increase fatigue which is already a problem in our industry as I am sure your accident investigations have verified.

I do very much agree with the proposal concerning the training of new pilots. This is long overdue.

Steve Cummings
License no 727344
1600 Ton master
First Class pilot
O. V. T. U.

AUG 15 1996

(Name) OTIS A. MCCOY
(Mailing Address) PO. Box 248
(City/State) HENDERSON NVA. 25106
(Date) 8-16-96

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347, I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

FIRST OF ALL LET ME SAY THAT ANY CHANGE THAT A
PROPOSED TO NECESSITATE SAFETY IS CERTAINLY
WELCOMED BY ME. AFTER CAREFUL STUDY OF THE PROPOSED
CHANGES I FIND THAT MOST CHANGES ARE UNPROVEN AND
WILL FULLY OR PARTIALLY CREATE A WORKING HARD SHIP ON EVERY
PERSON ASSOCIATED WITH RIVER TRANSPORT TRADE AND
FEEL THE IMPACT COULD RESULT IN DISASTER IN FACT
TO THIS GREAT COUNTRY. A SHIFT OF RESPONSIBILITY IS ONE
A CATCH "OF WHO TO BLAME ONLY MAKING IT MUCH
EASIER TO FINGER THE MASTER. "NO MATTER WHO'S AT FAULT
AND THE 3,000 HORSE POWER CHANGE WILL EVEN ADD TO OUR PROBLEMS AND
IT WILL CAUSE A HARD SHIP ON OPERATORS AND COMPANIES A LIKE
SHOULD ADVISE THAT YOU RECONSIDER THE SE PROPOSALS AND EXAMINE
THE COMPANIES WITHIN THE INLAND WATERWAYS SUCH AS THE OHIO
KANAWHA, MON. ALLEGHENY TENN. RIVERS GET A FIRST HAND LOOK AT WHAT

Signature: OTIS A. MCCOY (Attach additional pages)

CONT. NEXT PAGE
PLEASE.

USES WILL BE OUR TRADE
A GENERATION BOATMAN. I
WANT YOU TO GIVE THIS MUCH MORE
AND TRIAL BEFORE IT BECOMES
PLEASE BELIEVE THAT I
YOUR CONCERN FOR SAFETY
AND PROPERTY BUT FEEL THESE
THE RIGHT ANSWERS TO ANY
LET ME THANK YOU IN
AS I FEEL WE HAVE
THE RIGHT ONE

to AT MC Coy

16/96

AUG 19 1996

Capt. Douglas D. Turner, OUTV
73 Dawes Lane
Benton, KY 42025

License Issue #5-5
License Serial #88269
Date: August 19.1996

To: Executive Secretary, Marine Safety Council [G - LRA/3406] (CGD 94-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 205930001

Subject: Comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

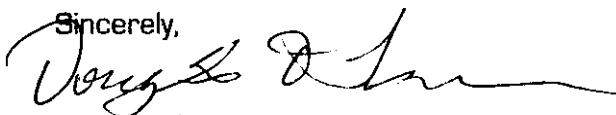
Dear Sirs,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. I request that a public meeting be held at the Paducah Coast Guard Marine Safety Office, and that adequate notification to all the area towing interests be made. in order to discuss and fully explain all aspects of this rulemaking. I also request that you mail a copy of the Final Rule to me at this address when it is published.

In addition. I would like to add my views to the public docket concerning this rulemaking procedure. I believe that the horsepower restriction should be dropped from the proposed rules for licensing regulation. The amount of horsepower of a motor vessel should not be the determining factor of the license an operator receives. Big is not necessarily better, or safer. The truth is that operators of smaller horsepower vessels must have a greater skill level: they must be able to think faster, plan their maneuvers further ahead, and have a better understanding of the dynamics of the job they are doing because their vessel has less horsepower capability compared to a larger, more powerful vessel with the same amount of tonnage in tow. Therefore, I, as a pilot with 22 years experience in the wheelhouse, feel that it takes just as much skill to operate a vessel with 1,600 hp as it does a vessel with 3,000 hp or more.

Concerning the proposed rule requirement for renewal of licenses involving either a simulator or a check-ride with a designated examiner, I feel that this is an unnecessary expense, a waste of hard-earned money. I think that taking a refresher course, which would update pilots on the rules of the road and the changing regulations, would enhance the safety awareness of motor vessel operators.

Sincerely,



Douglas D. Turner
(502) 898-3233

(Name) Raymond F. Bollinger
(Mailing Address) 4712 Sonfield
(City/State) Metairie, LA 70006
(Date) July 24, 1996

JUL 24 1996

TO: Executive Secretary, Marine Safety Council (G-LRA/3406)(CGD W-055)
United States Coast Guard Headquarters
2100 Second Street, SW
Washington, DC 20593-0001

SUBJECT: My comments on Notice of Proposed Rulemaking on Licensing and Manning for Officers of Towing Vessels.

Gentlemen,

I have read the Notice of Proposed Rulemaking concerning the Licensing and Manning of Towing Vessels. Because I do not have a copy of 46 CFR Parts 10 & 15, and since only changes to these regulations are cited in the NPRM on pages 31341 through 31347. I request that a public meeting be held at the nearest Coast Guard Marine Safety Office after adequate public notice to all towing interests to fully explain and discuss all aspects of this rulemaking. I further request that you mail me a copy of the Final Rule at this address when published.

I would also like to make the following personal comments to the public docket about this rulemaking:

1. This rule operates to defeat previously publicly stated Coast Guard goals of increasing professional mariner lateral mobility between trades to the detriment of the national defense. This proposed rule creates new barriers for merchant mariners to cross over to a more viable trade activity when economic circumstances warrant. It will render the over all merchant marine workforce smaller and less flexible, less able to respond to either changing economic time or national defense needs.
2. This rule creates new training expenses for the towboat mariner that will prove prohibitively expensive. The mariner was NOT CONSULTED DURING THE FORMATION OF THIS PROPOSAL
3. As written this proposal will force many towboat personnel who have become inactive by pursuit of employment on other classes of vessels or in maritime management or administration ashore out of the license system, again reducing the workforce, reducing flexibility and response and driving up wages and freight rates.
4. This rule ignores the custom of "posting up" on a particular route already followed by responsible carrier. If the posting up custom were to become regulation, many of the goals sought by this new rule would be accomplished without changes to the license structure that adversely affect the industry, the mariner and our national defense posture.
4. Radar training and the return to a master, mate, pilot, steersman nomenclature are needed reforms, but licensed masters of inspected vessels should not automatically lose all TBO authority, most have at least some TBO experience but may not have what is required to carry over the endorsement as proposed. the industry thus loses a viable pool of quickly trainable mariners who have another economic and examination hurdle to overcome to change trades, when all that is needed is adequate "posting". Inspected vessel masters should continue to be endorsed as TBOs subject to an expressed "posting" requirement.

Signature: _____ (Attach additional pages)

R.F. Bollinger

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